UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

<u>Floyd Little, et al.</u> v. National Football League, et al.

Court File No. 2:12-cv-2219-AB

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFFS STU AND LINDA VOIGT

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, P.L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Stu Voigt and Linda Voigt only in this action, and state as follows:

- 1. Plaintiffs' counsel filed the action *Floyd Little, et al. v. National Football League, et al.*, No. 2:12-cv-2219-AB, in the Eastern District of Pennsylvania on April 24, 2012, for the benefit of several retired National Football League players, including Stu Voigt and Linda Voigt.
- 2. Plaintiffs' counsel filed a short form complaint for Stu Voigt and Linda Voigt on July 16, 2012.

- 3. Since then, irreconcilable differences have arisen between Plaintiffs Stu Voigt and Linda Voigt and the undersigned.
- 4. Plaintiffs' counsel properly notified Stu Voigt and Linda Voigt of counsel's intention to withdraw from representing them in this matter.
- 5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Stu Voigt and Linda Voigt only in Court File No. 2:12-cv-2219-AB.

Dated: June 10, 2015 Respectfully submitted,

ZIMMERMAN REED, P.L.L.P.

s/ Brian C. Gudmundson

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